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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIGUEL ZUNIGA ARTEAGA,
ARMANDO MARTINEZ,
TERRY WHITED,
MIGUEL ANGEL SANCHEZ-MEZA,
JUAN VIZUETT-RESENDIZ, and
VINCENTE SALVADOR ARENAS-GARCIA,

Defendants.

CASE NO. 1:20-CR-00212 DAD-BAM

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
AND ORDER

CURRENT DATE: August 10, 2022
TIME: 1:00 p.m.
COURT: Hon. Barbara A. McAuliffe

STIPULATION

1. By previous order, this matter was set for status on August 10, 2022.
2. By this stipulation, defendants now move to continue the status conference until December 14, 2022, and to exclude time between August 10, 2022, and December 14, 2022, under Local Codes T2 and T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes over 15,000 pages of Bates stamped discovery and several months of wiretap recordings. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

1 b) Counsel for defendants desire additional time to consult with their clients, to
2 review the current charges, to conduct investigation and research related to the charges, to review
3 and copy discovery for this matter, to discuss potential resolutions with their clients, to prepare
4 pretrial motions, and to otherwise prepare for trial.

5 c) The parties anticipate that they will be ready to schedule a trial date on or before
6 the next scheduled status conference date.

7 d) Counsel for defendants believe that failure to grant the above-requested
8 continuance would deny them the reasonable time necessary for effective preparation, taking into
9 account the exercise of due diligence.

10 e) The government does not object to the continuance.

11 f) Additionally, given the voluminous discovery and the fact that this case involved
12 a wiretap investigation, it is so complex that it is unreasonable to expect adequate preparation for
13 pretrial proceedings or for the trial itself prior to December 14, 2022.

14 g) Based on the above-stated findings, the ends of justice served by continuing the
15 case as requested outweigh the interest of the public and the defendant in a trial within the
16 original date prescribed by the Speedy Trial Act.

17 h) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
18 et seq., within which trial must commence, the time period of August 10, 2022 to December 14,
19 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
20 T4] and 18 U.S.C. § 3161(h)(7)(A), B(ii) [Local Code T2], because it results from a continuance
21 granted by the Court at defendants' request on the basis of the Court's finding that the ends of
22 justice served by taking such action outweigh the best interest of the public and the defendant in
23 a speedy trial.

24 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the

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Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: August 3, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ JESSICA A. MASSEY
JESSICA A. MASSEY
Assistant United States Attorney

Dated: August 3, 2022

/s/ NICHOLAS REYES
NICHOLAS REYES
Counsel for Defendant
MIGUEL ZUNIGA ARTEAGA

Dated: August 3, 2022

/s/ CAROLINE MCCREARY
CAROLINE MCCREARY
Counsel for Defendant
ARMANDO MARTINEZ

Dated: August 3, 2022

/s/ RICHARD A. BESHWATE
RICHARD A. BESHWATE
Counsel for Defendant
MIGUEL ANGEL SANCHEZ-
MEZA

Dated: August 3, 2022

/s/ MONICA BERMUDEZ
MONICA BERMUDEZ
Counsel for Defendant
JUAN VIZUETT-RESENDIZ

Dated: August 3, 2022

/s/ HARRY DRANDELL
HARRY DRANDELL
Counsel for Defendant
VINCENTE SALVADOR
ARENAS-GARCIA

ORDER

IT IS SO ORDERED that the status conference is continued from August 10, 2022, to **December 14, 2022, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: August 4, 2022

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE